

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT TACOMA

DALLAS HOAGLAND)
)
)
Plaintiff,) Civ. No.
)
vs.)
) COMPLAINT
SOCIAL SECURITY ADMINISTRATION)
)
Defendant.)

Complaint for Injunctive Relief

1. This is an action under the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552, to compel the production of records, specifically the name of the Administrative Law Judge ("ALJ") employed by the Defendant who will be presiding at Ms. Hoagland's disability hearing on December 14, 2012.

Jurisdiction and Venue

2. This Court has jurisdiction under 5 U.S.C. § 552(a)(4)(B).
3. Plaintiff is an adult citizen residing in Aberdeen, Grays Harbor County, Washington, who has applied for Social Security Disability benefits and is awaiting her disability

1 hearing. This action is brought in the judicial district in which Plaintiff resides and
2 venue is proper in the Western District of Washington.

- 3 4. Defendant, the Social Security Administration ("SSA") is responsible for the
4 administration of the Social Security Act and Regulations. The SSA is an agency within
5 the meaning of 5 U.S.C. § 552(f), and is in possession of the records requested by
6 Plaintiff.

7
8 **Plaintiff's FOIA Request and Defendant's Response**

- 9 5. On May 15, 2012, Plaintiff, through her representative, filed an online FOIA request
10 for the name of the ALJ who will preside at her disability hearing scheduled December
11 14, 2012. (See Exhibit "A", attached hereto).
- 12 6. The Plaintiff's FOIA request was denied by Dawn S. Wiggins, SSA Freedom of
13 Information Officer, by letter dated May 24, 2012. (See Exhibit "B", attached hereto).
- 14 7. On June 1, 2012, Plaintiff appealed Ms. Wiggins' denial, by sending a written
15 FREEDOM OF INFORMATION APPEAL to the Executive Director for the Office of
16 Privacy and Disclosure. (See Exhibit "C", attached hereto).
- 17 8. On July 11, 2012, Gwen Jones Kelley, Deputy General Counsel, upheld Ms. Wiggins'
18 decision to withhold the name of the ALJ assigned to hold the disability hearing. Ms.
19 Kelley advised that this was the final agency decision, and that Plaintiff has the right
20 to seek review in a United States District Court. (See Exhibit "D", attached hereto).
- 21 9. All administrative remedies have been exhausted.

22
23 **Claim for Relief**

- 24 10. FOIA requires federal agencies to make records available to the public, with only nine
25 exemptions to this general presumption of mandatory disclosure. These exemptions
26

were specifically made exclusive and must be narrowly construed. Dept of the Air Force v. Rose, 425 U.S. 352, 361 (1976).

11. None of the nine FOIA exemptions is applicable to the type of information requested by the Plaintiff - the name of the ALJ who will be presiding at her disability hearing.
12. Exemption 2 does not apply in this case, as it exempts only records solely related to internal personnel rules and practices that could cause a breach in security if disclosed. Examples include computer access codes and portions of the Systems Security Handbook which could enable unauthorized individuals to alter SSA records. POMS Section: GN 03301.015 B(5)(a). (POMS is the Defendant's Program Operations Manual System, and is the primary source of information used by SSA employees. It is available online at <http://policy.ssa.gov/poms.nsf/partlist?OpenView>. A copy of the relevant section is appended to this Complaint as Exhibit "E").
13. Exemption 7E does not apply in this case, as it exempts only "records or information compiled for law enforcement purposes" 5 U.S.C. § 552(b)(7)(E). A SSA disability hearing is administrative in nature, not criminal and not related to law enforcement.
14. The information requested – the name of the ALJ who will preside at Ms. Hoagland's disability hearing – is easily accessible, and can be obtained and communicated by the Defendant in less than 5 minutes.
15. The information requested is of utmost importance to Ms. Hoagland, as it will enable her representative to advise her as to what to expect at her hearing. Different ALJs have vastly different approaches to the process and follow different procedures at the hearing.
16. It is important to Ms. Hoagland to know in advance if the ALJ will be male or female, due to the nature of her anxiety disorder.
17. It is important for Ms. Hoagland to know in advance if the ALJ's style of questioning will be aggressive, due to the nature of her mental impairments.

- 1 18. It is important for Ms. Hoagland to know the identity of the ALJ in advance, to enable
2 her representative to determine if the expense of additional witness will be necessary.
- 3 19. It is important for Ms. Hoagland to know in advance if her ALJ is one who asks the
4 claimants detailed questions about the medical evidence, so that she and her
5 representative can spend additional time reviewing every page of every document
6 prior to the hearing.
- 7 20. It is important for Ms. Hoagland to know if the ALJ is one who wants her
8 representative to submit a pre-hearing memorandum, or one who finds that practice
9 impertinent or unnecessary.
- 10 21. It is important for Ms. Hoagland to know who the ALJ is in advance, to permit for
11 screening of potential conflicts as early in the process as possible, as required by
12 Social Security regulation 20 C.F.R. § 416.1440 ("An ALJ shall not conduct a hearing if
13 he or she is prejudiced or partial with respect to any party or has an interest in the
14 matter pending for decision. If you object to the ALJ who will conduct the hearing, you
15 must notify the ALJ at your earliest opportunity.")
- 16 22. Prior to December 2011, the Defendant always revealed the identity of the ALJ at the
17 time the hearing was scheduled, without any hardship or harm. Upon information and
18 belief, the Defendant changed its policy in December 2011, without proper notice and
19 comment.

20
21 **Prayer for Relief**

22 WHEREAS Plaintiff requests that this Court:

- 23 1. Declare that Defendant's refusal to disclose the record requested by Plaintiff is
24 unlawful, and in violation of FOIA;
- 25 2. Order Defendant to disclose the name of the ALJ who will preside at Plaintiff's
26 disability hearing;

3. Enjoin Defendant from refusing to provide the name of the ALJ in all future FOIA requests filed by claimants who have filed a Request for Hearing in their Social Security cases;
4. Make specific findings of fact regarding Defendant's arbitrary and capricious violation of FOIA, and refer the matter to Special Counsel and/or the Merit Systems Protection Board for investigation as provided in 5 U.S.C. § 552(a)(4)(F);
5. Expedite this proceeding as provided for in 28 U.S.C. § 1657;
6. Award costs and reasonable attorneys fees as provided by 5 U.S.C. § 552(a)(4)(E); and
7. For such other relief as this Court deems proper.

DATED THIS 23d day of August, 2012.


JEANNETTE LAFFOON, WSBA #30872
Attorney for Plaintiff

Electronic Freedom of Information Act

www.socialsecurity.gov



General Request for Social Security Records

Your request has been submitted successfully.
Please print or save this page for your records.

Requester's Name: Jeanette Laffoon
Case Number: AI2677
Current time: Tue May 15 19:33:47 EDT 2012

Thank you for your request. You should receive a response within 20 days. If you need to check on the status of your request, please call 410-965-1727 and refer to the Case Number.

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Dallas Hoagland

Ex. "A"



SOCIAL SECURITY

Refer to:
S9H: AI2677

May 24, 2012

RECEIVED

MAY 29 2012

MADDOX & LAFFOON, P.S.
ATTORNEYS AT LAW

Ms. Jeanette Laffoon
Attorney at Law
Maddox & Laffoon, P.S.
410-A South Capitol Way
Olympia, WA 98501

Dear Ms. Laffoon: ^{MS}

I am responding to your May 15, 2012 Freedom of Information Act (FOIA) request on behalf of your client Mr. Dallas Hoagland, for the name of the assigned Administrative Law Judge (ALJ) currently scheduled to conduct his hearing.

I am withholding the name of the ALJ assigned to hear this case under FOIA Exemption 2 (5 U.S.C. § 552(b)(2)). This exemption protects from disclosure records "related solely to the internal personnel rules and practices of an agency." The information you seek is the internal personnel assignment of an agency employee to a particular case. Therefore, you are not entitled to it under the FOIA.

I am also withholding the ALJ's name under FOIA Exemption 7(E) (5 U.S.C. § 552(b)(7)(E)). Exemption 7(E) exempts from mandatory disclosure records or information compiled for law enforcement purposes when production of such records "would disclose techniques and procedures for law enforcement investigations or prosecutions, or would disclose guidelines for law enforcement investigations or prosecutions if such disclosure could reasonably be expected to risk circumvention of the law." Information may fall within this exemption even if it was originally compiled for non-law enforcement purposes, if it is later related to crime prevention or security measures. *Milner v. Department of Navy*, 131 S.Ct. 1259, 1272-73 (2011) (Alito, J., concurring).

If you disagree with this decision, you may appeal it. Mail the appeal within 30 days after you receive this letter to the Executive Director for the Office of Privacy and Disclosure, Social Security Administration, 617 Altmeyer Building, 6401 Security Boulevard, Baltimore, Maryland 21235. Mark the envelope "Freedom of Information Appeal."

Sincerely,

Dawn S. Wiggins

Dawn S. Wiggins
Freedom of Information Officer

Ex "B"

✓ TD

MADDOX & LAFFOON, P.S.

ATTORNEYS AT LAW

410-A SOUTH CAPITOL WAY ♦ OLYMPIA, WA 98501

STEPHEN A. MADDOX
JEANETTE LAFFOON

TELEPHONE: (360) 786-8276
FAX: (360) 534-9516

FREEDOM OF INFORMATION APPEAL

June 1, 2012

Executive Director for the Office of Privacy and Disclosure
Social Security Administration
617 Altmeyer Building
6401 Security Boulevard
Baltimore MD 21235

Via Certified Mail
Return Receipt Requested

RE: S9H: A12677

Dear Executive Director:

This is written in response to a 5/24/12 decision by Dawn S. Wiggins, denying my FOIA request on behalf of my client Ms. Dallas Hoagland.

The sole piece of information we are requesting is the name of the ALJ who will be presiding at Ms. Hoagland's disability hearing December 14, 2012. The information is needed to advise Ms. Hoagland as to what to expect at her hearing. The Tacoma ODAR employs 10 ALJs, all with different demeanors, approaches to the hearing process, and demands regarding the presentation of evidence. The identity of the ALJ has been provided in advance of SSA disability hearings for decades, with no evident hardship on the agency. No other agency or court keeps the identity of a presiding judge secret. It is anathema to the concept of a fair hearing, especially in the context of SSA hearings, which are supposed to be non-adversarial, fact-gathering proceedings. Reed v. Massanari, 270 F.3d 838 (9th Cir. 2001).

Ms. Wiggins denied our FOIA request based on Exemptions 2 and 7E. We contend that this was legal error.

Exemption 2

Exemption 2 protects human resources and employee relations records, such as matters relating to pay, pension, vacation, parking and so forth. The rationale is to relieve agencies of the burden of assembling and providing access to trivial or routine matters "in which the public could not reasonably be expected to have an interest." Dept of the AF v. Rose, 425 U.S. 352, 369-370 (1976). The information we are requesting – just the name of the ALJ who will be presiding at Ms. Hoagland's hearing – does not fall within this exemption. We are not asking you to assemble any personnel information about the ALJ, just his or her name. The identity of the

Ex. "C" (1)

Executive Director for the Office of Privacy and Disclosure
 June 1, 2012
 Page Two

ALJ is NOT trivial to Ms. Hoagland, as she needs to know what to expect at perhaps the most important hearing of her life. There is no indication that it will create a burden on the agency to produce this information, as it never has in the past. To the contrary, there is actually a new burden on the schedulers who must now keep the identity of the ALJ hidden, as it impacts the ability of representatives to accept appointments on the same day without knowing if the hearings will be with the same ALJ. Many ALJs get behind in their schedules, and expect the representative to be present at whatever time they get to the case. While this is not a problem if we know that subsequent hearings will be with the same ALJ, we cannot agree to build potential conflicts into our schedules and risk delay or dismissal of clients' hearings. Thus, the burden of scheduling hearings is actually heightened when the identity of the ALJs holding them is kept secret.

Further, Exemption 2 specifically applies only to "internal" information, meaning that "the agency must typically keep the records to itself for its own use." Milner v. Department of the Navy, 131 S.Ct. 1259 (2011). The name of the ALJ in a particular case is not such an "internal" record, as it is displayed on the Decision itself, which is subject to appeal in a public forum (Federal District Court). We are not asking for information that the agency never makes public (such as employees' personnel information), but merely that public information be released early enough to permit proper preparation for the disability hearings.

Exemption 7E

Exemption 7 protects disclosure of "records or information compiled for law enforcement purposes" but only if one or more of six specified types of harm would result. 5 U.S.C. § 552(b)(7). The specific harm of concern to Ms. Wiggins, is that if she discloses the name of the ALJ who will be holding Ms. Hoagland's hearing, that it would "reveal techniques and procedures for law enforcement investigations or prosecutions" and that "disclosure of the information could reasonably be expected to risk circumvention of the law." 5 U.S.C. § 552(b)(7)(E).

Social Security disability claims have nothing to do with law enforcement. Ms. Hoagland is not a criminal, but is merely a disabled citizen who can no longer work because of her impairments. It is perfectly legal to file a claim for disability benefits – Ms. Hoagland is not in any way in danger of breaking any law by accessing her right to a fair, due-process hearing. She is not being prosecuted, nor is she being investigated. Knowing who her judge will be will not "risk circumvention of the law" but will merely enable her to participate in her own hearing in a meaningful way. Application of Exemption 7E in these circumstances is insulting and unreasonable.

Executive Director for the Office of Privacy and Disclosure
June 1, 2012
Page Three

No Harm Would Result From Disclosure of the ALJ's Name

FOIA requires federal agencies to make government records available to the public, with nine exemptions to this general presumption of mandatory disclosure. These exemptions are "specifically made exclusive ... and must be narrowly construed." Dept of the Air Force v. Rose, 425 U.S. 352, 361 (1976). As discussed above, a narrow interpretation of Exemptions 2 and 7E render them inappropriate in this case.

Further, an agency has the authority to construe the exemptions as discretionary rather than mandatory when no harm would result from disclosure of the requested information. Chrysler Corp. v. Brown, 441 U.S. 281, 293 (1979). We ask that you use that authority to provide us with the name of the ALJ assigned to conduct Ms. Hoagland's disability hearing. No harm will result from disclosure. To the contrary, if Ms. Hoagland knows what type of interrogation to expect, she will be better prepared to respond to the ALJ's questions and the hearing will run more smoothly. For example, two of the ALJs in the Tacoma ODAR conduct their hearings by referring to minutia in the written record and asking the client to comment on it. If I know that one of these ALJs will be conducting the hearing, I can prepare Ms. Hoagland by spending a few hours with her to go over all the documents in detail, so she is not blindsided by something she has never seen or something that she wrote herself several years prior to the hearing. Obviously this cannot be done in every single case, as there simply are not enough hours in the day, but if we are aware of the identity of the ALJ we can prepare properly for that type of hearing. This is just one example of how knowing the identity of the ALJ in advance could avoid harm.

We would appreciate a prompt response. Thank you for your time.

Sincerely,



Jeannette Laffoon
Attorney

Cc: Dallas Hoagland
Tacoma ODAR

c(3)



SOCIAL SECURITY

Office of the General Counsel

Refer to:

S9H: AI3627

July 11, 2012

Ms. Jeanette Laffoon
Maddox & Laffoon, P.S.
Attorneys at Law
410-South Capitol Way
Olympia, WA 98501

RECEIVED

JUL 16 2012

MADDOX & LAFFOON, PS
ATTORNEYS AT LAW

RE: Ms. Dallas Hoagland

Dear Ms. Laffoon:

I am responding to your June 1, 2012 Freedom of Information Act (FOIA) appeal of Ms. Dawn Wiggins' decision to withhold the name of the administrative law judge (ALJ) scheduled to conduct your client's hearing.

After considering all of the facts of this case, I agree with Ms. Wiggins' decision to withhold the name of the ALJ assigned to hear this case under FOIA Exemption 2 (5 U.S.C. § 552(b)(2)). This exemption protects from disclosure records "related solely to the internal personnel rules and practices of an agency." The information you seek is the internal personnel assignment of an agency employee to a particular case. Therefore, you are not entitled to it under FOIA.

I also reaffirm the decision to withhold the ALJ's name under FOIA Exemption 7(E) (5 U.S.C. § 552(b)(7)(E)). Exemption 7(E) exempts from mandatory disclosure records or information compiled for law enforcement purposes when production of such records "would disclose techniques and procedures for law enforcement investigations or prosecutions, or would disclose guidelines for law enforcement investigations or prosecutions if such disclosure could reasonably be expected to risk circumvention of the law." Information may fall within this exemption even if it was originally compiled for non-law enforcement purposes, if it is later related to crime prevention or security measures. *Milner v. Department of Navy*, 131 S.Ct. 1259, 1272-73 (2011) (Alito, J., concurring).

This letter is the agency's final decision in this matter. If you still believe the decision is incorrect, you may pursue mediation services through the Office of Government Information Services (OGIS). You also may seek review in a United States District Court. While you cannot pursue mediation and litigation simultaneously, using OGIS' services does not affect your right to pursue litigation.

Ex. "D" (1)

You may contact OGIS in any of the following ways:

Office of Government Information Services
National Archives and Records Administration
8601 Adelphi Road – OGIS
College Park, MD 20740-6001
E-mail: ogis@nara.gov
Telephone: 202-741-5770
Fax: 202-741-5769
Toll-Free: 1-877-684-6448

Sincerely,



Gwen Jones Kelley
Deputy General Counsel

D(2)

POMS Section: GN 03301.015

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Effective Dates: 07/19/2006 - Present

TN 3 (11-98)

GN 03301.015 Freedom of Information Act (FOIA) and EFOIA

A. Introduction

The FOIA affects SSA's policies on what administrative and instructional material must be released for the information of the public. It may also require the release of personal information if one or more of the FOIA exemptions do not allow SSA to withhold the records.

The FOIA as amended by EFOIA amendments of 1996, gives the public access to government information and records maintained in an electronic format, provides for expedited processing of certain requests, establishes "electronic reading rooms," eliminates an agency "backlog of work" as a justification for delay in processing requests, requires redacted material to be estimated or indicated in an agency's response, and requires an agency reference guide on FOIA to be made available.

B. Policy

1. General

The FOIA mandates disclosure to the public of all Federal agency records, unless one of nine specific exemptions applies.

Even though the FOIA permits an agency to withhold a record that meets one of the nine exemptions, it does not require withholding. There may be circumstances under which SSA may choose to disclose if:

- Section 1106(a), the PA and any other applicable statutes permit, and
- no demonstrable harm would result.

The FOIA also mandates a 20-day time limit for deciding whether or not the requested information can be disclosed.

Ex. "E" (1)

2. Scope

The FOIA applies to all records maintained by a Federal agency.

This includes (but is not limited to):

- Final agency opinions in the adjudication of claims;
- Statements of policy and interpretations adopted by the agency but not published in the *Federal Register* (e.g. Commissioner's Decisions, Social Security Rulings, etc.); and
- Administrative staff manuals and instructional material; and
- Personally identifiable records.

NOTE: The FOIA requires that a list of this material be published in the Federal Register and made available to the public for inspection and copying. This list is available in the FOIA Indexes of Administrative Manuals and Instructions. Each SSA field component receives a copy of the Indexes, which are updated quarterly. The indexes are also maintained in the FOIA Reading Room on SSA's INTERNET site at <http://www.ssa.gov>.

3. What is an FOIA Request

An FOIA request is any request from a member of the public for records in possession or control of a Federal agency. Under the FOIA, a "member of the public" includes requests from individuals, corporations, State agencies and foreign entities. Requests from other Federal agencies, or from Federal or State courts, are not covered by the FOIA.

EXCEPTION: Under certain circumstances a subpoena may be processed as an FOIA request when it involves records not subject to Regulation No. 1. (See GN 03330.000 for information about court orders and subpoenas.)

Any office may receive an initial request for records under the FOIA. The request need not be in writing and does not need to cite the FOIA.

4. What is Not an FOIA Request

The following are not treated as FOIA requests:

- Requests for explanations of policies and procedures, the status of claims, and general information about Social Security programs (such as public information material); and
- Requests by individuals (or persons authorized to act in their behalf) for access to their own records that are retrieved by a personal identifier, unless a request has already been denied under the PA (also see GN 03360.000).

A request by a parent of a minor child or by a guardian of an incompetent individual seeking records on behalf of that person is generally a PA request. However, such requests should be referred to the FOI Officer for consideration under the FOIA if access cannot be granted under the PA because the parent or guardian is not acting on behalf of that person.

NOTE: While PA requests are not processed as FOIA requests, they should now be reported

as FOIA requests for the purpose of the Annual Report on FOIA activities.

5. FOIA Exemptions

There are nine exemptions to the FOIA. The FOI Officer makes all decisions involving exemptions.

A complete list of the exemptions is in GN 03301.099C., Exhibit 2. However, only the following six usually apply to SSA records:

a. Exemption 2, Internal Personnel Rules and Practices

This exemption is cited as the basis for withholding records solely related to internal personnel rules and practices, such as certain records or procedures that could cause a breach in security.

EXAMPLES:

- Instructions for operating terminals, computer access codes, etc. This kind of instruction would not normally affect the rights of the public.
- Those portions of the Systems Security Handbook which could enable unauthorized individuals to gain access to confidential information or to alter SSA records.

b. Exemption 3, Prohibited by Law

This exemption is cited when a disclosure is prohibited by a law that leaves no discretion as to what may be exempt, or that establishes specific criteria for withholding information.

EXAMPLES:

- The Internal Revenue Code restricts disclosure of tax return information as defined in GN 03320.001B.
- 42 U.S.C. 290dd-3 and 290ee-3 restrict disclosure of information regarding identity, diagnosis, prognosis or treatment of any patient when such information is maintained in connection with a Federally-assisted drug or alcohol abuse prevention function. (See GN 03305.020.)

c. Exemption 4, Trade Secrets and Commercial or Financial Information

This exemption is cited to withhold information obtained from outside Government that relates to "trade secrets and commercial or financial information which, if disclosed, would either cause substantial harm to a person's ability to compete with others in his business or impair the Government's ability to obtain needed information." This may include detailed information concerning profits, losses and business costs.

This exemption does not apply to SSA program records and is generally used in connection with procurement records.

d. Exemption 5, Interagency or Intra-agency Memorandums

This exemption is cited to withhold "interagency or intra-agency memorandums or letters which would not be available by law to a party other than a party in litigation with the agency."

The exemption covers opinions (such as OGC opinions), recommendations, suggestions or judgmental analyses by various field and central office components of SSA as exchanged or developed *before* the making of policy or decisions. It does not cover materials that contain purely factual information or that document or explain decisions already made.

e. Exemption 6, Invasion of Privacy

This exemption is cited to withhold any personal information, "the disclosure of which would constitute a clearly unwarranted invasion of personal privacy." It applies in any situation in which the privacy interest in the requested information outweighs the public interest (if any) served by disclosing the information.

GN 03316.105, GN 03316.110, GN 03316.115, GN 03316.120, GN 03316.125 lists disclosures which have been determined *not* to be unwarranted invasions of personal privacy.

A U.S. Supreme Court decision in 1989 (*U.S. Department of Justice vs. Reporters Committee on Freedom of the Press*) ruled that this exemption applies to personally identifiable information about living individuals unless:

- Disclosure would inform the public about a Federal agency's performance of its statutory duties, and
- This public interest outweighs the privacy interests of the individuals to whom the information pertains.

EXAMPLE: A requester wants to know whether his neighbor receives Social Security benefits. Disclosure would not serve the public interest and would constitute an invasion of the neighbor's privacy, so Exemption 6 applies.

f. Exemption 7, Investigatory Records

This exemption is cited to withhold records compiled for law enforcement purposes if the production of such records:

- could reasonably be expected to interfere with enforcement proceedings,
- would deprive a person of a right to a fair trial on any impartial adjudication,
- could reasonably be considered an unwarranted invasion of personal privacy,
- could reasonably be expected to disclose the identity of a confidential source,
- could reasonably be expected to disclose confidential information furnished only by a confidential source (in the case of a record compiled by a criminal law enforcement authority in an investigation, or by an agency conducting lawful national security

intelligence),

- would disclose investigative techniques and procedures or guidelines for law enforcement investigations or prosecutions (if such disclosure could risk circumvention of the law), or
- could reasonably be expected to endanger the life or physical safety of law enforcement personnel.

To Link to this section - Use this URL:
<http://policy.ssa.gov/poms.nsf/lnx/0203301015>

GN 03301.015 - Freedom of Information Act (FOIA) and EFOIA - 07/19/2006
Batch run: 01/27/2009
Rev:07/19/2006



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E (5)